

Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP, Room 4007-s
Agstop 0275, PO Box 96456
Washington DC 20090-6456

Docket # TDM-94-00-2: General Comments.

Please accept the following comments on the Proposed Organic Rule and enter them into the official record.

I strongly believe that the Proposed Organic Rule is not compatible or consistent with established organic principles. I request that the USDA re-issue a Proposed Organic Rule that is based on the legalities of the Organic Food Production Act of 1990 and the recommendations of the National Organic Standards Board. All comments of this first Proposed Organic Rule should remain part of the record for the rulemaking process. Organic farming, trade and consumer groups have identified many problem areas in the Proposed Organic Rule. We ask that you protect our strong organic standards. I have the following specific comments on the Proposed Organic Rule.

To write a credible organic rule the USDA must:

1. Follow the recommendations of the National Organic Standards Board which do reflect the will of the organic community. Restore section 205.4 of the National Organic Standards Board's version of the Proposed Organic Rule (variance language).
2. Prohibit and never allow the use of biosolids, ionizing irradiation or genetically engineered organisms in a system of organic production and handling.
3. Avoid pricing the small food producer and food handler out of the organic foods market. I recommend that USDA use sliding fees scale rather than the proposed flat fee scale.
4. Define organic agriculture as: A holistic production and marketing system that promotes and enhances the agroecological health, including biodiversity, biological cycles, and soil biological activity. It emphasizes the use of management practices in preference to the use of off-farm inputs. This is accomplished by using cultural, biological and mechanical methods, as opposed to using synthetic materials to fulfill any specific function within the system.
5. Require livestock feed to ruminants and poultry be free of rendered animal products. Also require only organic feed fed to organic livestock.
6. Require that livestock have access to fresh air and the outdoors.
7. Prohibit antibiotics, pesticides, synthetic amino acids and growth hormones in organic livestock production.
8. Give the same authority to both accredited State and Private certification programs. State and Private certification programs should be allowed to display their certification logo anywhere on the product.
9. Allow accredited certifiers to de-certify offenders who are trying to defraud the National Organic Program. As an accreditation agency the USDA must stay out of the de-certification business process.
10. Uphold the legal authority of the NOSB by prohibiting the Secretary from adding exemptions for the use of specific synthetic substances to the Proposed National List submitted by the NOSB.

Organic Food is a partnership between the farmer and the consumer. It is not just an environmental label, but a label representing this unique partnership. In order to build a consumer respected National Organic Program, the USDA must join in this "partnership" and write a credible Proposed Organic Rule.

(Additional Comments below, and / or on attached sheet).

Please review comments from the Wedge Community Co-op, the Coulee Region Organic Production Pool (CROPP), The Organic Trade Association (OTA), the Independent Organic Inspectors Association (IOIA), and the Organic Materials Research Institute (OMRI). Thank you for reading my comment.

Sincerely,

Name/Business

Address

City/State/Zip Code